

Appln No. 10/713,083  
Amdt. Dated November 17, 2003  
Response to Office Action of November 16, 2004

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### REMARKS/ARGUMENTS

The Office Action has been carefully considered. The issues raised are respectfully submitted to be traversed and addressed below with reference to the relevant headings appearing under the Detailed Action of the Office Action.

The Applicant has added a new paragraph to page 1 of the specification entitled "Cross Reference to Related Application". The Applicant submits that this amendment introduces no new matter.

#### *"Claim Rejections – 35 USC § 112"*

At pages 2 to 3 of the Office Action, under 35 U.S.C. §112(b), the Examiner rejects claims 1 to 19, as failing to comply with the written description requirement.

The Applicant has fully considered the Office Action and the Examiner's detailed comments but respectfully traverses the Examiner's assertion that the claims fail to comply with 35 USC 112.

The Applicant shows possession of the claimed invention by describing the claimed invention using such descriptive means as words, structures, figures, diagrams and formulas that fully set forth the claimed invention (*Lockwood v American Airlines, Inc.*, 107 F.3d 1565, 1572, 41 USPQ 2d 1961, 1966 (Fed. Cir. 1997)).

Thus, the Applicant submits the following comments for the Examiner's consideration and respectfully again reminds the Examiner of the strong presumption that an adequate written description of the claimed invention is present when the application is filed (*In re Wertheim*, 541 F.2d 257, 263, 191 USPQ 90, 97 (CCPA 1976)).

In particular, claim 1 of the present application describes a half-toner/compositor (an example of which is shown in Figures 3, 4 and 5), to composite respective strips of the decoded image planes, wherein each plane is allocated to a respective contone buffer (see Figure 5, where the programming of individual PECs for strips within the overall page may be organized in a margin unit within the half-toner/compositor, see page 3), by halftoning a contone layer to a bi-level version and compositing a spot1 bi-level layer (the bi-level spot1 buffer shown in Figure 5), over an appropriate halftoned contone layer (see also Figure 4 and as further described on page 13 lines 9 to 20).

Claim 1 further describes a printhead interface to output the composite strip to a printhead. An example of a printhead interface is shown in figure 3, and further illustrated in figure 12. Additionally, the printhead interface includes a multi-segment printhead interface (an example of which is described on pages 16 lines 19 to page 17 line 11), and a synchronisation signal generator, such as two LineSyncGen units (LSGU), where the first LSGU produces a signal which is used to control the Memjet Interface in all synchronised chips and the second unit produces a second signal which is used to pulse the paper drive stepper monitor (see Figure 12, and page 24). Thus, both the half-toner/compositor and the printhead interface are described at an adequate level to permit one skilled in the art to reasonably conclude that the inventor had possession of the claimed invention.

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It is also highlighted to the Examiner that the present application incorporates by cross-reference the disclosures of numerous patent applications as detailed on pages 1 and 2. Particularly, the Applicant's US Patents/Applications 09/575,108, 09/575,109, 09/575,110, 6,398,332, 6,394,573, and 6,622,923 describe a print engine/controller which further details particular features of the presently claimed invention.

It is respectfully submitted that claim 1 as a whole, and the dependant claims, are adequately described as each essential feature of claim 1 is adequately described in the specification at a sufficient level to allow one skilled in the art to realise the inventor was in possession of the claimed invention. The Examiner is again respectfully reminded that it has been considered (*In re Wertheim*) that the United States Patent and Trademark Office has the initial burden of presenting evidence why a person skilled in the art would not recognise in the disclosure a description of the invention defined by the claims. In light of the foregoing clarification and discussion it is respectfully submitted that the Examiner's rejection has been traversed.

### CONCLUSION

In light of the above, it is respectfully submitted that the claim rejections have been successfully traversed and addressed. Accordingly, it is respectfully submitted that the claims, and the application as a whole with these claims, are allowable, and favourable reconsideration is therefore earnestly solicited.

Very respectfully,

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